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May 3, 2022

BY ECF

Hon. Paul A. Engelmayer
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square, Room 1305
New York, New York 10007

RE: *Underwood, et al. v. Coinbase Global, Inc.*,
1:21-cv-08353-PAE

Dear Judge Engelmayer:

We represent Defendants Coinbase Global, Inc., Coinbase, Inc., and Brian Armstrong (collectively, “Defendants”) in the above-referenced action. On May 10, 2022, Defendants anticipate filing a joint motion in response to the Amended Complaint. Pursuant to Rules 1A and 3C of Your Honor’s Individual Rules and Practices in Civil Cases, we write to respectfully request permission to file a combined memorandum of law of up to 30 pages in support of the motion. Lead Plaintiffs’ counsel consents to this request, and the parties have agreed to a corresponding 5 page extension for any opposition.

The Amended Complaint includes over 1,000 paragraphs of allegations and 15 causes of action pursuant to which Plaintiffs allege Defendants are liable under the federal and state securities laws. The requested page extension will enable Defendants to fully address the issues presented by these allegations, which Defendants anticipate challenging on multiple grounds.

Hon. Paul A. Engelmayer
May 3, 2022
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Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Lara Flath", with a stylized flourish at the end.

Lara A. Flath

cc: All Counsel of Record (via ECF)